

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

PATRICIA LOWRY, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

RTI SURGICAL HOLDINGS, INC.,
CAMILLE I. FARHAT, BRIAN K.
HUTCHISON, JONATHON M. SINGER,
ROBERT P. JORDHEIM, and JOHANNES
W. LOUW,

Defendants.

No.: 20 C 01939

Honorable Matthew F. Kennelly

**CLASS PLAINTIFF’S MOTION FOR
PRELIMINARY APPROVAL OF SETTLEMENT**

Lead Plaintiff Rosy Yeretsian (“Class Plaintiff”), on behalf of herself and all others similarly situated, moves this Court for preliminary approval of the proposed Settlement and notice to the Class on her claims that Defendants violated Sections 10(b) and 20(a) of the Securities Exchange Act of 1934, as well as Rule 10b-5 promulgated thereunder. In support of this motion, Class Plaintiff relies upon her contemporaneously-filed memorandum of law.

WHEREFORE, Class Plaintiff respectfully requests that the Court grant preliminary approval of the proposed Stipulation of Settlement (the “Stipulation”, Exhibit 1 hereto) and enter the accompanying Order of Preliminary Approval (*see* Stipulation, internal Exhibit A).

Dated: August 31, 2021

By: /s/ Louis C. Ludwig
Patrick V. Dahlstrom
Louis C. Ludwig
Pomerantz LLP
10 South LaSalle St., Ste. 3505

Chicago, IL 60603
312.377.1181
pdahlmstrom@pomlaw.com
cludwig@pomlaw.com

Velvel (Devin) Freedman
Kyle W. Roche
Ivy T. Ngo
Constantine P. Economides
Roche Freedman LLP
200 South Biscayne Blvd, Ste. 5500
Miami, FL 33131
305.851.5997
vfreedman@rcflp.com
kyle@rcflp.com
ingo@rcflp.com
ceconomides@rcflp.com

Class Counsel